

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a	)	Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FEDERAL INSURANCE COMPANY,	)	
an Indiana corporation, and ACE	)	
AMERICAN INSURANCE	)	
COMPANY, a Pennsylvania	)	
corporation,	)	
	)	
Defendants.	)	

**DECLARATION OF ALLEN W. HINDERAKER IN SUPPORT OF PLAINTIFF  
FAIR ISAAC CORPORATION’S MEMORANDUM IN OPPOSITION TO  
DEFENDANTS’ MOTION TO EXCLUDE THE EXPERT REPORT AND  
TESTIMONY OF RANDOLPH BICKLEY WHITENER**

I, Allen W. Hinderaker, declare as follows:

1. I am an attorney with Merchant & Gould P.C., and I am one of the attorneys of record for Plaintiff Fair Isaac Corporation in the above captioned matter.
2. I make this declaration on my own information, knowledge, and belief in support of Plaintiff’s Fair Isaac Corporation’s Memorandum in Opposition to Defendant’s Motion to Exclude the Expert Report and Testimony of Randolph Bickley Whitener.
3. Attached hereto as Exhibit 1 is a true and correct copy of Federal Insurance Company’s Fifth Supplemental Answer to Plaintiff’s Interrogatory No. 16 and Sixth

Supplemental Answer to Plaintiff's Interrogatory No. 17, dated March 21, 2019. This document is filed UNDER SEAL.

4. Attached hereto as Exhibit 2 is a true and correct copy of Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 18, dated March 21, 2019. This document is filed UNDER SEAL.

5. Attached hereto as Exhibit 3 is a true and correct copy of Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 19, dated March 2, 2019. This document is filed UNDER SEAL.

6. Attached hereto as Exhibit 4 is a true and correct copy of Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 20, dated March 21, 2019. This document is filed UNDER SEAL.

7. Attached hereto as Exhibit 5, is a true and correct copy of Federal Insurance Company's Blaze Advisor usage and sizing chart, produced as Bates numbered document FED017914. This document is filed UNDER SEAL.

8. Attached hereto as Exhibit 6 is a true and correct copy of an excerpt of the transcript of the June 27, 2019 deposition of Randolph Bickley Whitener. This document is filed UNDER SEAL.

9. Attached hereto as Exhibit 7 is a true and correct copy of an excerpt of the Expert Reply Report of R. Bickley (Bick) Whitener, dated May 31, 2019. This document is filed UNDER SEAL.

10. Attached hereto as Exhibit 8 is a true and correct copy of a Chubb PowerPoint entitled Chubb Enterprise Architecture Business Rules Strategy/Roadmap

produced as Bates numbered document FED000275. This document is filed UNDER SEAL.

11. Attached hereto as Exhibit 9 is a true and correct copy of an excerpt of the transcript of the June 5, 2019 deposition of William McCarter. This document is filed UNDER SEAL.

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: August 26, 2019

/s/ Allen W. Hinderaker  
Allen W. Hinderaker